

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

PARKER POE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 3:24-CV-00368
	)	
DR. MELANIE LOWE, in her	)	
individual and official capacity,	)	Judge Crenshaw
DR. JEREMY BOURGOIN, in his	)	Magistrate Judge Frensey
individual and official capacity,	)	
VANDERBILT UNIVERSITY,	)	JURY DEMANDED
NEIL JAMERSON, in his individual	)	
and official capacity, LISA	)	
CLAPPER, in her individual	)	
and official capacity,	)	
DR. JAMIE BOJARSKI, in her	)	
individual and official capacity,	)	
and DR. CYNTHIA PASCHAL, in her	)	
individual and official capacity,	)	
	)	
Defendants.	)	

***EMERGENCY MOTION TO INTERVENE FOR THE LIMITED PURPOSE OF  
PROTECTING THE ANONYMITY OF THIRD-PARTY SIMON ROE AND TO SEAL  
PLAINTIFF'S PROPOSED AMENDED COMPLAINT (DOC. NO. 25-1) AND  
PROHIBIT FURTHER DISCLOSURE OF ROE'S IDENTITY***

In a series of anonymous social media posts popular with college students, Plaintiff Parker Poe made false and defamatory statements about a third party identified in Poe's pleadings as "Simon Roe." After acknowledging that disclosing Roe's identity in this litigation is unnecessary and certain to inflict serious harm on Roe *and* while subject to state-court orders that protect Roe's anonymity, Poe named Roe and his father more than 300 times in a proposed Amended Complaint (Doc. 25-1). Only immediate action by the Court to grant intervention and seal or strike the abusive filing will prevent Poe from inflicting further irreparable harm on Roe.

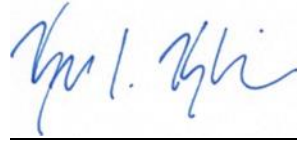
Accordingly, and as set forth in detail in the accompanying Memorandum of Law, Roe moves to intervene in this case for the limited purpose of preventing Poe from doing an end-run around the state court's conclusion and for an order protecting Roe's anonymity.<sup>1</sup> Specifically, Roe requests that the Court:

- (1) grant Roe intervention for the limited purpose of protecting his anonymity;
- (2) immediately place Poe's proposed Amended Complaint (Doc. No. 25-1) under seal on an emergency basis;
- (3) enter an order requiring that all parties preserve Roe's anonymity by referring to him using the pseudonym "Simon Roe" adopted by Poe in the original complaint and referring to his family members using related pseudonyms; and
- (4) set a telephonic conference to coordinate any additional briefing or determinations required to make any such orders permanent.

---

<sup>1</sup> Counsel for Roe conferred with Poe's counsel on Thursday, June 27, 2024, about whether Poe would consent to the Amended Complaint being sealed. Poe's counsel has not responded stating whether this relief is opposed.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kevin C. Klein".

---

Kevin C. Klein (TN Bar No. 23301)  
Jeffrey W. Sheehan (BPR No. 33534)  
Klein Solomon Mills, PLLC  
1322 4th Avenue North  
Nashville, Tennessee 37208  
(615) 600-4780  
kevin.klein@kleinpllc.com  
jeff.sheehan@kleinpllc.com

*Counsel for Third-Party Intervenor Simon Roe*

## CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2024, a true and correct copy of the foregoing EMERGENCY MOTION was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt, including:

Cory R. Miller  
Jacob E. Moses  
Brewer, Krause, Brooks, Chastain & Meisner, PLLC  
545 Mainstream Drive, Suite 101  
Nashville, TN 37228  
cmiller@bklaw.com

*Attorneys for Plaintiff*

Mark A. Baugh  
Ryan P. Loofbourrow  
Katie Dwyer  
Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C.  
1600 West End Avenue, Suite 2000  
Nashville, TN 37203  
mbaugh@bakerdonelson.com  
rloofbourrow@bakerdonelson.com  
kdwyer@bakerdonelson.com

*Attorneys for Defendants*



---

Kevin C. Klein